

REMARKS

Claims 1-19 were pending in this application. By virtue of this response, claims 1, 10, and 19 have been amended, no claim has been added, and no claim has been canceled. Therefore, claims 1-19 are presently pending. Amendment of certain claims is not to be construed as a dedication to the public of any of the subject matter of the claims as previously presented. The claim amendments are supported by, for example, paragraphs [0011], [0039], [0044], [0087], [0099]-[0101], [0107] and FIG. 1 of the originally filed specification, as published.

I. Claim Rejections Under 35 U.S.C. § 101**A. Claims 1-9**

Claims 1-9 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter because the claimed system allegedly includes components that each may be implemented in software. (Office Action, page 2.)

Applicants have amended claim 1 to recite “a memory for storing computer-readable instructions” and “a processor for executing the instructions.” Accordingly, Applicants submit that amended claim 1 recites an apparatus comprising a memory and processor, and is thus directed to statutory subject matter.

Applicants further submit that dependent claims 2-8 are allowable for at least the reason that they depend from allowable independent claim 1. Accordingly, Applicants respectfully request that the rejection of claims 1-9 withdrawn.

B. Claim 19

Claim 19 stands rejected under 35 U.S.C. § 101 for reciting a computer readable medium which allegedly includes “transitory type media,” which “have been held to be non-statutory.” (Office Action at page 3.)

Applicants have amended claim 19 to recite a “non-transitory computer-readable storage medium.” Because the claimed computer-readable storage medium is limited to include only non-transitory media, Applicants submit that amended claim 19 is directed to statutory subject matter.

Accordingly, Applicants respectfully request that the rejection of claim 19 be withdrawn.

II. Claim Rejections Under 35 U.S.C. § 103

Claims 1-19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Henry et al. (EP 1286260, published 26 February 2003, hereafter Henry) and further in view of Beranek et al. (GB 2329309, published 17 March 1999, hereafter Beranek) and further in view of Ledru et al. (US 2004/0163090, filed 19 February 2003, hereafter Ledru).

Applicants submit that Henry, Beranek, and Ledru, either alone or in combination, do not render claims 1-19 obvious for at least the following reasons: First, the cited references do not disclose or suggest all of the limitations of the amended claims. Second, the proposed modification will alter the principle of operation of the system described in Henry, which is impermissible under MPEP § 2143.01(VI). Third, the proposed modification will render the system described in Henry unsatisfactory for its intended purpose, which is impermissible under MPEP § 2143.01(V).

A. The references do not disclose or suggest all the limitations of the claims

1. HTML document

The Examiner stated that Ledru discloses a “display not generating an HTML document” and that it would have been obvious to combine the teachings of Ledru with that of Henry and Beranek to meet the system of representative claim 1. (Office Action, page 5, emphasis added.) The Examiner appears to reason that Ledru’s command line interface (“CLI”) is “incapable of displaying markup data” and therefore Ledru teaches a display (i.e., the CLI) that does not generate an HTML document. (See Ledru, FIGS. 4 and 9.)

To advance prosecution, Applicants have amended claim 1 to further clarify the relationship between the pending claims and the creation of HTML documents. Representative claim 1, as amended, recites:

- an acquisition unit which acquires the device internal information of the one or more information devices, wherein the device internal information is not described in HTML . . .
- a providing unit which provides the generated device-information-based layout tree to the rendering unit of the information browser without creating an HTML document

(Emphasis added.)

Applicants submit that these limitations of amended claim 1 are not disclosed or suggested by Henry, Beranek, and/or Ledru.

Henry describes the translation of an HAVi DDI user interface (e.g., of a VCR) into an HTML page so that an HAVi DDI-equipped device may be controlled from a remote PC. (*See* Henry, Title, FIG. 2, and [0031].) Thus, Henry creates an HTML page. As such, Henry does not disclose or suggest “a providing unit which provides the generated device-information-based layout tree to the rendering unit of the information browser without creating an HTML document,” as recited by claim 1. (Emphasis added.)

The Beranek reference does not cure Henry’s deficiencies. Beranek describes a proxy server for intercepting an HTML Web document and reformatting the document’s content to alter the “look and feel” of displayed content. (Beranek, 6:8-7:4.) Implicit in Beranek’s reformatting operation is the *a priori* creation of an HTML document, which is then received by Beranek’s proxy server in HTML format. Thus, Beranek does not disclose or suggest “an acquisition unit which acquires the device internal information of the one or more information devices, wherein the device internal information is not described in HTML,” and “a providing unit which provides the generated device-information-based layout tree to the rendering unit of the information browser without creating an HTML document,” as recited by claim 1. (Emphasis added.)

The Ledru reference does not cure the deficiencies of Henry and Beranek. Ledru describes a server that transcodes an HTML web page into a plain text page. (Ledru, [0027] and [0032].) Specifically, Ledru describes a server that performs the following operations:

- “Extract[ing] the corresponding Java server page from the Web page repository”
- “Build[ing] the appropriate HTTP request for the Java server page and the output is an HTML Web page”
- “Send[ing] the HTML Web page to the filter”
- “Transcod[ing] the HTML web page into a plain text response”

(Ledru at FIG. 10, emphasis added.)

From the operations listed above, it is clear that the Ledru’s transcoding server receives a “HTML Web page” in order to produce a plain text response. Thus, even assuming that the received HTML web page somehow contains device internal information, Ledru still does not disclose or suggest “an acquisition unit which acquires the device internal information of the one or more information devices, wherein the device internal information is not described in HTML.”

Further, from the operations listed above, Ledru also describes the creation of an HTML page by a “Java server page.” Thus, Ledru also does not disclose or suggest “a providing unit which provides the generated device-information-based layout tree to the rendering unit of the information browser without creating an HTML document,” as recited by claim 1. (Emphasis added.)

Accordingly, Applicants submit that Henry, Beranek, and Ledru, either alone or in combination, fail to disclose or suggest all the limitations of amended claim 1, and therefore the proposed combination fails to render the claim unpatentable.

2. Device-information-based layout tree

The device of amended claim 1 further includes:

- a generation unit which generates a device-information-based layout tree containing layout information of the device internal information, wherein:
 - the device-information-based layout tree is different from the acquired document data,
 - the device-information-based layout tree is not analyzed by the analysis unit that analyzed the acquired document data, and
 - the device-information-based layout tree is not generated by the generation unit that generated the document-based layout tree;

As discussed above, Henry creates an HTML page based on an HAVi DDI user interface. Thus, even assuming for the sake of argument that an HAVi DDI user interface may be considered device internal information, Henry still does not disclose or suggest, “a generation unit which generates a device-information-based layout tree containing layout information of the device internal information,” let alone the generation unit as recited by amended claim 1. (Emphasis added.) Rather, Henry creates an HTML page.

Beranek does not cure Henry’s deficiencies. As discussed above, Beranek describes a proxy server for intercepting an HTML Web document and reformatting the document’s content to alter the “look and feel” of displayed content. Beranek does not display any information analogous to device internal information, and therefore has no need to generate a “device-information-based layout tree containing layout information of the device internal information,” let alone the generation unit as recited by amended claim 1. Rather, Beranek discloses a customization feature for the HTML Web document.

Ledru also does not cure the deficiencies of Henry and Beranek. As discussed above, Ledru transcodes an HTML web page into a plain text page for viewing on a command line interface. Ledru does not display any information analogous to device internal information, and to the extent that Ledru displays information, the information is displayed in a command line interface. Therefore, Ledru does not disclose or suggest “a generation unit which generates a device-information-based layout tree containing layout information of the device internal information,” let alone the generation unit as recited by amended claim 1. (Emphasis added.)

For at least the reasons stated above, Applicants submit that Henry, Beranek, and Ledru, either alone or in combination, do not disclose or suggest all the limitations of amended claim 1, and therefore the proposed combination fails to render the claim unpatentable. Further, Applicants submit that independent claims 10 and 19 are not rendered unpatentable for at least the reasons discussed with respect to claim 1. Dependent claims 2-9 and 11-18 are allowable for at least the reason that they depend from allowable independent claims. Accordingly, Applicants respectfully request that the rejections of claims 1-19 be withdrawn and the claims allowed.

B. The proposed combination will alter the principle of operation of Henry, in violation of MPEP § 2143.01(VI)

Modifying Henry's HAVi DDI converter with Ledru's technique will alter Henry's principle of operation impermissibly, thus, the combination is not obvious. (See MPEP § 2143.01(VI)).

Henry teaches "translating an HAVi DDI user interface to the HTML world." (Henry at Title.) That is, Henry teaches an HAVi DDI to HTML translator. In contrast, Ledru teaches transcoding an HTML page to a plain text page. (Ledru at Abstract.) That is, Ledru teaches an HTML to plain text transcoder.

Notably, the Examiner's proposed combination of Henry and Ledru relies on the creation of a plain text page as taught by Ledru. (See Office Action, page 5.) However, if Henry's HAVi DDI to HTML translator is modified with Ledru's HTML to plain text transcoder, the modified translator would produce a plain text page. More specifically, the modified translator would first convert an HAVi DDI user interface into an HTML page (as taught by Henry), and then transcode the HTML page into a plain text page (as taught by Ledru).

Therefore, even assuming for the sake of argument that the proposed modification is possible, the modification will produce an HAVi DDI to plain text translator, as opposed to an HAVi DDI to HTML translator as taught by Henry originally. Thus, the proposed modification will alter the basic functionality of the translator taught by Henry.

For at least the reasons given above, Applicants submit that the modification of Henry's translator with Ledru's technique will alter Henry's principle of operation, which is impermissible under MPEP § 2143.01(VI).

C. The proposed combination will render Henry's translator unsatisfactory for its intended purpose, in violation of MPEP § 2143.01(V)

Indeed, proposed modification will also render the Henry's translator unsatisfactory for its intended purpose, thus, the combination is not obvious. (See MPEP § 2143.01(V)).

Henry states that its server "translates HAVi DDI graphics into web graphics" so that an HAVi DDI equipped device (e.g., a VCR) may be controlled from a remote PC. (Henry at [0021]-[0023], emphasis added.) To this end, Henry translates an HAVi DDI user interface into an HTML web page, which, as is well-known, supports the "web graphics" described in Henry.

In contrast, the modification of Henry's translator with Ledru's transcoding technique will turn Henry's HTML page into a plain text page that is suitable for display on a command line interface. Consistent with the ordinary meaning "plain text," Ledru further describes that the transcoding process "may remove all graphical user interface elements, such as images, icons, etc., from the Web page and may potentially rearrange the textual data in a format suitable for display on the command line interface client." (Ledru at [0027].)

Therefore, even assuming for the sake of argument that the proposed modification is possible, the modified translator will produce a plain text page that represents HAVi DDI data from a HAVi DDI device (e.g., a VCR). Clearly, a reasonable user would find it unsatisfactory to control a HAVi DDI device, such as a VCR, via a command line user interface, such as MS-DOS.

Since one of the stated purposes of Henry is to produce web graphics from an HAVi DDI user interface, but the modification of Henry's translator with Ledru's technique will produce a plain text page devoid of web graphics, Applicants submit that the proposed modification will render Henry's translator unsatisfactory for its stated purpose, which is impermissible under MPEP § 2143.01(V).

For at least the reasons given above, Applicants submit that the proposed combination of Henry, Beranek, and Ledru is not obvious. Therefore, the proposed combination fails to render claim 1 unpatentable. Further, for at least the reasons discussed with respect to claim 1, Applicants submit that the proposed combination also fails to render independent claims 10 and 19 unpatentable. Dependent claims 2-9 and 11-18 are allowable for at least the reason that they depend from allowable independent claims. Accordingly, Applicants respectfully request that the rejections of claims 1-19 be withdrawn and the claims allowed.

CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. **448252001600**. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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